



Patent Application No.: 09/702,687

Attorney Docket No.: 71195

DECLARATION OF PRIOR INVENTION - JAMES D. GEE, JR.

I, James D. Gee, Jr., declare under the pains and penalties of perjury under the laws of the United States of America and the State of Tennessee that the following is true and correct. The following facts are based on my personal knowledge.

1. I am the sole inventor of the invention disclosed and claimed in US Patent Application No. 09/702,687, filed November 1, 2000, Examiner Joseph G. Ustaris.
2. Upon information and belief, the Office Action mailed December 2003 rejects claims 1, 4, 5, 12, 16, 25, 27 and 28 as being anticipated by Proposed HOST-POD Interface Specifications. This Interface Specification is dated, as issued, on January 7, 2000. Whereas, Applicant filed the subject application on November 1, 2000.
3. I declare that the invention represented by the referenced application, including the rejected claims, was reduced to practice prior to the stated issue date for Interface Specifications of January 7, 2000.
4. The following evidence was filed as part of Declaration and Response to Office Action on April 29, 2004: and is made part of this Declaration and Response to Final Office Action:
 - a. Email from S. W Baik to Jim Gee dated October 17, 1999
 - b. Email from James D. Gee, Jr. to Mr. Baik dated October 18, 1999

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- c. Email from James D. Gee, Jr. to Mr. Baik dated November 16, 1999
- d. Email from James D. Gee, Jr. to Mr. Batik dated November 19, 1999
- e. Letter from James D. Gee, Jr., to Mr. S.H. Lee dated January 15, 2000
- f. Email from James D. Gee, Jr. to Mr. Lee dated January 17, 2000
- g. Agreement of Exclusivity by and between Global Cable, Inc., and Teletech Co., Ltd. Executed January 19, 2000 by Jeannette L. Gee, President, Global Cable Inc., and January 23, 2000 by Dong Kwon Park, President, Teletech, Co., Ltd.
- h. Email from James D. Gee, Jr., to Mr. Jeffery Park dated January 26, 2000
- i. Letter from James D. Gee, Jr. to Mr. Lee and Chang-Soo dated March 23, 2000

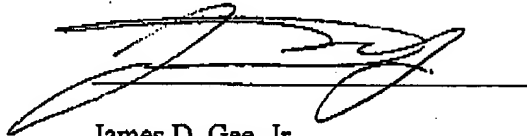
4. I declare that the invention and product which is the topic of the above identified documents did encompass all the features claimed by claims 1, 4, 5, 12, 15, 16, 25, 27, and 28 which are rejected by the examiner as being anticipated by Proposed HOST-POD Interface Specification. Specifically the invention / product which was the subject of the above identified evidence existed prior to the publication date of the cited document and included all of the following features:

- a. A method and a device for interfacing POD modules with a multichannel video receiver comprising determining the POD type and interface parameters and adapting the multichannel video receiver to interface with the POD module.
- b. A method and a device which determined the POD type automatically.
- c. A method and a device which automatically detected the POD type by recognizing a type message form the POD module.

- d. A device which further comprised an adaptability input/output portion to mate to electrically mate with the input output portion of the POD module when it interfaces with the multichannel receiver.
- e. A device with an input/output portion which was configured to receive a smart card.

I acknowledge that willful false statements and the like are punishable by law, or imprisonment, or both (18 USC 1001) and may jeopardize the validity of the application or any patent issued thereon. All statements made of my own knowledge are true, all statements made in information and belief are believed to be true.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'James D. Gee, Jr.', written over a horizontal line.

James D. Gee, Jr.

Dated: January 26 2004



Patent Application No.: 09/702,687

Attorney Docket No.: 71195

DECLARATION OF PRIOR INVENTION – ROBERT COLLINS

I, Robert Collins, declare under the pains and penalties of perjury under the laws of the United States of America that the following is true and correct. The following facts are based on my personal knowledge.

1. I was employed by James D Gee, Jr who is the inventor of US Patent Application No. 09/702,687, filed November 1, 2000, Examiner Joseph G. Ustaris.
2. I declare that the invention represented by the referenced application, including the rejected claims, was reduced to practice prior to the stated issue date for Interface Specifications of January 7, 2000.
3. I am substantively aware of the following evidence which was filed as part of Declaration and Response to Office Action on April 29, 2004: and is made part of this Declaration and Response to Final Office Action:
 - a. Email from S. W Baik to Jim Gee dated October 17, 1999
 - b. Email from James D. Gee, Jr. to Mr. Baik dated October 18, 1999
 - c. Email from James D. Gee, Jr. to Mr. Baik dated November 16, 1999
 - d. Email from James D. Gee, Jr. to Mr. Batik dated November 19, 1999
 - e. Letter from James D. Gee, Jr., to Mr. S.H. Lee dated January 15, 2000
 - f. Email from James D. Gee, Jr. to Mr. Lee dated January 17, 2000

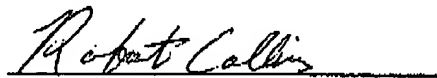
- g. Agreement of Exclusivity by and between Global Cable, Inc., and Teletech Co., Ltd. Executed January 19, 2000 by Jeannette L. Gee, President , Global Cable Inc., and January 23, 2000 by Dong Kwon Park, President, Teletech, Co., Ltd.
- h. Email from James D. Gee, Jr., to Mr. Jeffery Park dated January 26, 2000
- i. Letter from James D. Gee, Jr. to Mr. Lee and Chang-Soo dated March 23, 2000

4. I declare that the invention and product which is the topic of the above identified documents did encompass all the features claimed by claims 1, 4, 5, 12, 15, 16, 25, 27, and 28 which are rejected by the examiner as being anticipated by Proposed HOST-POD Interface Specification. Specifically the invention / product which was the subject of the above identified evidence existed prior to the publication date of the cited document and included all of the following features:

- a. A method and a device for interfacing POD modules with a multichannel video receiver comprising determining the POD type and interface parameters and adapting the multichannel video receiver to interface with the POD module.
- b. A method and a device which determined the POD type automatically.
- c. A method and a device which automatically detected the POD type by recognizing a type message form the POD module.
- d. A device which further comprised an adaptability input/output portion to mate to electrically mate with the input output portion of the POD module when it interfaces with the multichannel receiver.
- e. A device with an input/output portion which was configured to receive a smart card.

I acknowledge that willful false statements and the like are punishable by law, or imprisonment, or both (18 USC 1001) and may jeopardize the validity of the application or any patent issued thereon. All statements made of my own knowledge are true, all statements made in information and belief are believed to be true.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert Collins", is written over a horizontal line.

Robert Collins

Dated: January 25 2004

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